

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
HATTIESBURG DIVISION**

TALMADGE VERNON LANGSTON

PLAINTIFF

VS.

CIVIL ACTION NO. 2:12-CV-163-KS-MTP

3M COMPANY, *et al.*

DEFENDANTS

**PLAINTIFF'S RESPONSE TO AMERICAN OPTICAL
CORPORATION'S MOTION FOR SUMMARY JUDGMENT**

COMES NOW the Plaintiff, by and through the undersigned counsel, and files this *Response to American Optical Corporation's Motion for Summary Judgment* and would show unto the Court the following in support thereof:

The Plaintiff opposes American Optical's Motion for Summary Judgment. In support of this response, the Plaintiff submits the following exhibits:

Exhibit A: Report of Steven Haber, M.D.

Exhibit B: Deposition excerpts and Reports from Dr. Vernon Rose

Exhibit C: Deposition excerpts and Reports from Mr. Darell Bevis

Exhibit D: Deposition excerpts from Talmadge Langston

Exhibit E: 1980 ANSI Standards

WHEREFORE PREMISES CONSIDERED, the Plaintiff respectfully requests this Court to deny *American Optical's Motion for Summary Judgment* and to grant any other relief it deems appropriate.

DATED, this the 26th day of November, 2013.

RESPECTFULLY SUBMITTED

By: /s John T. Givens

John T. Givens, *Attorney for Plaintiff*

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CERTIFICATE OF SERVICE

I, JOHN T. GIVENS, the undersigned counsel for Plaintiff, do hereby certify that I have this date electronically filed the foregoing instrument with the Clerk of Court using the ECF system which sent notification of such filing to all counsel of record.

I hereby certify that I have mailed by United States Postal Service the document to the following non-ECF participants.

NONE

DATED, the 26th day of November, 2013.

s/ John T. Givens
John T. Givens